

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2023-9-E**

In re:  
Dominion Energy South Carolina,  
Incorporated's 2023 Integrated  
Resource Plan (IRP)

**SIERRA CLUB'S THIRD SET OF**  
**DATA REQUESTS**  
**APRIL 28, 2023**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

**INSTRUCTIONS**

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
  - (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Responsive documents should be provided as they become available and should not be withheld until a complete response to all requests is available. Please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

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## **DEFINITIONS**

1. The “Company” is defined to include both the Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
  - a. Its nature and contents;
  - b. Its date;
  - c. The date it was executed if different from the date it bears;
  - d. The name, address and position of its author or signer;
  - e. The name, address and position of its addressee, if any;
  - f. Its present location and the name, present address and position of the person or persons having present custody; and
  - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
8. “You” or “your” means Dominion and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of Dominion.

## **DATA REQUESTS**

**Request No. 3-1.** Please explain why DESC requires 50% of new solar resources selected by the PLEXOS LT model to be utility build rather than PPA build solar expansion units when the PPA build options are the lowest cost solar resources available for selection.

**Request No. 3-2.** Please provide an explanation as to why DESC did not incorporate IRA Energy Community Tax Credit Bonus for any solar or battery storage builds given that there are several “energy communities” based on recent or near-term fossil infrastructure retirements, such as the Wateree or Williams coal plants?

**Request No. 3-3.** Please explain why DESC does not allow the 50% firm capacity battery storage units to be built in the PLEXOS LT model until 2036+?

**Request No. 3-4.** Please explain why the FO&M cost for battery storage units (85% and 50% firm capacity) are different. Please provide workbooks that support these calculations with the formulas intact.

**Request No. 3-5.** Refer to the Company’s response to Sierra Club Request No. 1-5. Please explain why DESC chose to model the combined cycle candidate resource options using a lower heating value (LHV) gross heat rate instead of a higher heating value (HHV) net heat rate?

- a. Does DESC use LHV gross heat rates for all other thermal generators modeled, including the other candidate thermal resources?
- b. Is the natural gas price modeled in the DESC model in LHV units or HHV units?

**Request No. 3-6.** Please explain why DESC removes the non-firm purchases for the ST model beginning in 2038.

**Request No. 3-7.** Refer to the Company's Response to ORS Discovery Request No. 1-55. Do the historical 10-years of winter and summer peak demands include the impacts of DSM? If so, please provide the amount of DSM deployed and estimated peaks without those impacts.

Respectfully submitted this 28<sup>th</sup> day of April 2023.



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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2023-9-E, listed below, a copy of Sierra Club's Third Set of Data Requests via electronic mail on this day, April 28, 2023.

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Respectfully submitted this 28<sup>th</sup> day of April 2023.



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